

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<i>Counsel for the Plan Administrator</i>	
In re:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> , ¹	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR'S
SIXTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CLAIMS
(Reclassified Gift Card/Merchandise Credit Claims No. 13)**

The undersigned hereby certifies that:

1. On March 18, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Plan Administrator’s Sixteenth Omnibus Objection (Substantive) to Claims*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained at <https://restructuring.ra.kroll.com/bbby>. Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as “Bed Bath & Beyond Inc.” was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

(*Reclassified Gift Card/Merchandise Credit Claims No. 13*) [Docket No. 3956] (the “Sixteenth Omnibus Objection”).²

2. Pursuant to the *Notice of Objection to Your Claim* [Docket No. 3957] the deadline to object to the Omnibus Objection was April 15, 2025 (the “Objection Deadline”), and a hearing was scheduled for April 22, 2025 at 10:00 a.m. (ET) (the “Hearing”).

3. On April 16, 2025, counsel to the Plan Administrator filed a *Certificate of No Objection to the Omnibus Objection* [Docket No. 3986].

4. For the reasons discussed on the record at the Hearing, the attached revised proposed order removes Claim 12817 (the “Claim”) filed by Anneen Baum (“Claimant”). The Plan Administrator, the Debtors, the Estates and the Claimant reserve all rights, claims and defenses with respect to the Claim, and Claimant shall have additional time to respond to the Sixteenth Omnibus Objection.

5. It is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** (the “Order”) be entered at the Court’s convenience. A redline of the revised Order showing the changes from version originally filed with the Sixteenth Omnibus Objection is attached hereto as **Exhibit B**.

² Capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Omnibus Objection.

Dated: May 16, 2025

/s/ Colin Robinson

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